



March 1, 2008
Via ECFS Transmission

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Ms. Marlene H. Dortch, FCC Secretary
Office of the Secretary
Federal Communications Commission
445 12th Street, SW, Suite TW-A325
Washington, DC 20554

RE: **III Oliver Company, LLC - 2007 CPNI Certification Filing**
EB Docket No. 06-36

Dear Ms. Dortch:

Pursuant to the Commission's Public Notice of January 29, 2008, enclosed for filing please is the 2007 Annual CPNI Compliance Certification submitted on behalf of III Oliver Company, LLC, as required by section 64.2009(e) of the Commission's rules.

Any questions you may have concerning this filing may be directed to me at 470-740-3004 or via email to rmorton@tminc.com.

Sincerely,

Robin Norton
Consultant to III Oliver Company, LLC

RN/ks

cc: Best Copy and Printing - FCC@BCPIWEB.COM
FCC Enforcement Bureau (provided via ECFS website)
John Oliver - III Oliver
file: III Oliver - FCC
tms: FCCx0801

**ANNUAL 47 C.F.R. § 64.2009(e) OFFICER'S CERTIFICATION OF
CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI) COMPLIANCE**

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for Calendar Year: **2007**

Name of company covered by this certification: **III Oliver Company, LLC**


Form 499 Filer ID: **825378**

Name of signatory: **John C. Oliver, III**

Title of signatory: **President**

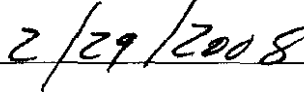
I, **John C. Oliver, III**, certify and state that:

1. I am the **President** of **III Oliver Company, LLC** and, acting as an agent of the company, I have personal knowledge of **III Oliver Company, LLC's** operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, **III Oliver Company, LLC's** operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules.



John C. Oliver, III, President
III Oliver Company, LLC

Date



2/29/2008

**Statement of CPNI Procedures and Compliance
For 2007
III Oliver Company, LLC**

III Oliver Company, LLC is a very small Texas inmate services provider and as such provides only operator assisted call completion services for transient end users. Therefore, all of our services consist of casual traffic provided outside of any subscribed service relationship, and we do not obtain or retain any CPNI that could be used for marketing purposes.

Our marketing efforts are directed only towards correctional facilities, and such efforts do not include the use of CPNI. Should we expand our business in the future to include the provision of services that involve CPNI, we will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed, that it implements authentication procedures that do not require the use of readily available biographical information or account information, that it notifies customers of account changes, and informs law enforcement in the event of a breach of customer CPNI.

As explained below, we have put into place processes to safeguard our customers' CPNI and call detail information from improper use or disclosure by employees; and to discover and protect against attempts by third parties to gain unauthorized access to customer CPNI.

We do not provide call detail information over the telephone. We have only two employees both of whom are trained not to discuss call detail information unless calling party can identify the call detail related to their inquiry.

We do provide on-line access to customer account information. Customers set up their own usernames and passwords to access this information on-line. If a password is forgotten or lost, we have a back-up authentication process that does not require readily available biographical or account information. We do not make changes to account information.

Call detail is always required to be made available to correctional facility management personnel, and who control their own access to it.

As an inmate services provider, we do not have any retail locations and therefore do not disclose CPNI in-store.

We have procedures in place to notify law enforcement in the event of a breach of the call detail records. We have not had any such breaches during 2007, but we have a process in place to maintain records of any breaches discovered and notifications made to the USSS and the FBI.

We have not taken any actions against data brokers in the last year.

We did not receive any customer complaints about the unauthorized release of CPNI or the unauthorized disclosure of CPNI in calendar year 2007.

Due to the nature of the inmate calling services business, the call detail we have is not tied to any presubscribed customers. Accordingly, we have not developed any information with respect to the processes pretexters may use to attempt to access CPNI.